Case 1-17-01085-ess Doe 443-12 Filed 95/99/49 Entered 95/99/49 25:04:59

# Exhibit L

to

Declaration of George F. Carpinello

## In The Matter Of:

Haas v. Navient Solutions, LLC,

Patricia P. Peterson September 19, 2017 Confidential

Wilcox & Fetzer, Ltd.
1330 King Street
Wilmington, DE 19801

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### Confidential

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1 A. Yes.		1 associated with this loan, could you do it	
2 Q. Okay. And do you know why you		2 through the servicing dashboard?	
3 provided just the monetary information for		3 A. I don't know if you can do it from	
4 loan 13?		4 CARES. I'm not sure.	
5 A. I could speculate it's the only		5 Q. Is it it's just not something that	
6 student loan that has a balance I don't		6 the servicing department needs to do, or how	
7 know. No. I don't know.		7 would they do it if they wanted to know the	
8 Q. Okay. Then if you go to the next		8 school codes?	
9 page, there's the servicing dashboard. So		9 A. I'm not familiar with their system,	
10 talk me through this. What is this?		10 this CARES system. Worst case, they could	
11 MR. FARRELL: Can you just give		11 drop to CLASS to get the information.	
12 the Bates page so we're all so we're all		12 Q. Okay. And then below it says, "1098-E	
13 clear?		13 2016 eligible, yes." Do you see that? Bottom	
<b>MR. BURGE:</b> Yes. It's 1898.		14 kind of in the middle.	
15 MR. FARRELL: Thanks.		15 A. Yes.	
<b>THE WITNESS:</b> This is a screen		<b>16</b> Q. And this stuff down at the bottom is	
17 shot of our CARES system, which is the		17 the details for the selected loan, 50293,	
18 interface that our customer service call		18 504853, 88743, right?	
center employees use when they're talking to		19 A. Yes.	
20 customers.		20 Q. That stuff is specifically is	
21 BY MR. BURGE:		21 specific to the one loan we're looking at, not	
<b>22</b> Q. This is the servicing as opposed to		22 to the borrower, correct?	
23 the collection side?		23 A. Yes.	
24 A. Yes.		<b>24</b> Q. So that suggests that for this loan it	
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### Confidential

Patricia P. Peterson **September 19, 2017** 

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Pat	ricia P. Peterson	Page 209	Pat	ricia P. Peterson	Page 21
1	mentioned earlier that you thought the current		1	letter would be entered into the	
2	procedure was when a borrower files		2	correspondence history in the account.	
3	bankruptcy, you don't switch over to the		3	Correct?	
4	cosigner until the bankruptcy is complete.		4	A. No.	
5	A. Correct.		5	Q. Okay. So how is the fact that this	
6	Q. That's the current policy. Was there		6	letter was sent to, in this case,	
7	a prior policy? Because it looks like this		7	Mark Markson, although that's a form name, if	•
8	suggests loans are being switched over to the		8	this letter is sent, how is that noted on the	
9	cosigner upon filing.		9	account?	
10	A. Yes. The previous policy was to do a		10	A. There is a note on the account, but it	
11	swap of the cosigner with the borrower.		11	doesn't necessarily have a code associated	
12	Q. And this policy is from the last		12	with it. There should be a note that says a	
13	publish date on this is December 12th of 2016.		13	letter was sent. I can tell you it hasn't	
14	So would that suggest that you were still		14	always had a note put on there, so you may	
15	swapping loans during bankruptcy as of		15	find in examples through the years that we	
16	December 2016?		16	don't necessarily have we consider this a	
17	A. No. I mean, I can't tell from here.		17	supplemental collection notice that doesn't	
18	We have to look at the other procedures that		18	come off of our main systems.	
19	talk about the discharge. It's potential that		19	Q. It is a form letter, though, right?	
20	in the discharge processing they put a code to		20	This is a letter that this wasn't like a	
21	have it going to the F57 for someone else to		21	one-off that somebody drafted up. This is a	
22	process the name switch.		22	letter that's sent it's drafted to be able	
23	Q. Let me show you another document. We		23	to be used multiple times, correct?	
24	will mark this 12.		24	A. Yes.	
Pat	ricia P. Peterson	Page 210	Pat	ricia P. Peterson	Page 212
1	(Peterson Deposition Exhibit		1	Q. And if somebody chooses to send this,	
2	No. 12 was marked for identification.)		2	it populates the information for the borrower	
3	BY MR. BURGE:		3	in the fields and then sends out looking like	
	Q. This is another form letter produced		4	this, correct?	
	in discovery. Do you recognize this document?			A. Yes.	
	A. I do.			Q. And to the extent that it's not	
	Q. What is this?		7	reflected on the account, that would only be	
	A. It is a notice coming from our		8	by user error. The procedure is, if followed,	
9	collections areas that the account is going to		9	the correspondence should reflect that the	
10	be reported to the credit bureaus because of a		10	letter was sent, right?	
11	delinquency.		11	A TT71 . T1 . 111 . A .1	
12	Q. When is this letter sent?		12	have not always had a corr documented who	en a
	A. I don't have the specific dates.		13	letter was sent out. Last many years the	
14	Before our credit bureau reporting? So which	l	14	procedures would say this, but I can't tell	
15	is typically 60 to 90 days. A few		15	you all the way back to 2005 that our	
16	dependencies on the different programs, but		16	procedures said we need to document these	
17	generally, 60 or 90 days past due.		17	supplemental letters. I don't know that.	
18	Q. Okay. And so with this letter, if we		18	Q. Since how long I mean, this	
19	don't have as near as I can tell, lots of		19	letter is dated January of 2009. Do you think	
20	Navient letters have a specific code for the		20	the procedures required that correspondence	
21	letter. Correct? There will be P something		21	be letters be reflected in the files since	
22	or M something or L something. I don't know		22	2009?	
23	what the code is for this letter, but if this		23	A. It will be close.	
24	letter is sent on an account, a code for the		24	Q. We could look at Navient's procedures	

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Pat	ricia P. Peterson Page 213	Pati	ricia P. Peterson	Page 215
1	and determine when the procedures changed such	1	doesn't. That's my point.	
2	that all letters had to be documented in the	2	Q. Let's talk about the procedures real	
3	files, correct?	3	quick, because you will note that all the	
4	A. I'm not sure if that's listed in the	4	procedures, we looked at a bunch of them, they	
5	procedures that specific information.	5	have this last publish date on the top.	
6	Q. Okay. So you said that at some	6	Right?	
7	point you believe that at sometime in the	7	A. Yes.	
8	past it was not required that all letters be	8	Q. That is the date that the particular	
9	reflected in the correspondence file.	9	version of the procedures we're looking at was	
10	Correct?	10	published, correct?	
11	MR. FARRELL: She said	11	A. Yes.	
12	supplemental letters.	12	Q. And so I will represent that, for many	
13	BY MR. BURGE:	13	of these procedures, we have many, many copie	S
14	Q. Supplemental letters.	14	with different last publish dates. Some of	
15	A. I'm saying I don't think we had a	15	them we have we might have 150 of the same	
16	policy that said one way or the other always.	16	procedures with different last publish dates	
17	We haven't always had a procedure that says	17	over, say, the last seven or eight years.	
18	anytime you send a supplemental letter	18	So with those, to the extent	
19	document the system. That has been something	19	that there is a procedure that covers letters,	
20	that's been added into our procedures for the	20	we could work back through the last publish	
21	last five to tenish years. It hasn't always	21	dates and figure out when there was a	
22	been there.	22	requirement that the supplemental letter be	
23	Q. Okay. We could look at your	23	sent to the borrower.	
24	procedures and determine when that was added,	24	Right?	
Pat	ricia P. Peterson Page 214	Pati	ricia P. Peterson	Page 216
Pati	ricia P. Peterson Page 214 correct?		ricia P. Peterson  A. Yes.	Page 216
1	· ·	1		Page 216
1	correct? A. Possibly.	1	A. Yes.	Page 216
1 2	correct? A. Possibly.	1 2 3	A. Yes. Q. Now, why do you refer to this as a	Page 216
1 2 3	correct?  A. Possibly.  Q. If it's in the procedures now and it	1 2 3	<ul><li>A. Yes.</li><li>Q. Now, why do you refer to this as a supplemental letter?</li></ul>	Ü
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	correct?  A. Possibly.  Q. If it's in the procedures now and it wasn't in the procedures before, then at some point it must have been added to the procedures.  MR. FARRELL: I'll stipulate to that.  BY MR. BURGE:  Q. I don't want to argue with you about this, but if it seems like if you have procedures that are in it now and not in it before  A. Yeah, it's just not as simple as did I have it in the procedures and didn't, because it could have been in one set of procedures that got rewritten into another document, or it could have just not existed. So that's why I'm hesitating.  Yes, you could piece back the	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes.  Q. Now, why do you refer to this as a supplemental letter?  A. Because it is not coming from a direct letter coming out of our servicing system. So it doesn't come directly out of FDR, CLASS. It supplements our correspondence. It isn't necessarily sent to a hundred percent of our customers, unlike what might be coming off the servicing system. We may target a certain population of customers that would get this letter.  As an example, if a customer has already been reported to the credit bureau, we may choose not to send this because it doesn't influence that customer as much as a customethat's never been reported.  Q. How can you tell this doesn't come out of the servicing system? What is it about it?  A. One, I know the letter. The other	of n ve t
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	correct?  A. Possibly.  Q. If it's in the procedures now and it wasn't in the procedures before, then at some point it must have been added to the procedures.  MR. FARRELL: I'll stipulate to that.  BY MR. BURGE:  Q. I don't want to argue with you about this, but if it seems like if you have procedures that are in it now and not in it before  A. Yeah, it's just not as simple as did I have it in the procedures and didn't, because it could have been in one set of procedures that got rewritten into another document, or it could have just not existed. So that's why I'm hesitating.  Yes, you could piece back the information to say at what point in time did	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Yes.  Q. Now, why do you refer to this as a supplemental letter?  A. Because it is not coming from a direct letter coming out of our servicing system. So it doesn't come directly out of FDR, CLASS. It supplements our correspondence. It isn't necessarily sent to a hundred percent of our customers, unlike what might be coming off of the servicing system. We may target a certain population of customers that would get this letter.  As an example, if a customer has already been reported to the credit bureau, we may choose not to send this because it doesn't influence that customer as much as a custom that's never been reported.  Q. How can you tell this doesn't come out of the servicing system? What is it about it?  A. One, I know the letter. The other part of it, it does not have the letter code	of n ve t
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	correct?  A. Possibly.  Q. If it's in the procedures now and it wasn't in the procedures before, then at some point it must have been added to the procedures.  MR. FARRELL: I'll stipulate to that.  BY MR. BURGE:  Q. I don't want to argue with you about this, but if it seems like if you have procedures that are in it now and not in it before  A. Yeah, it's just not as simple as did I have it in the procedures and didn't, because it could have been in one set of procedures that got rewritten into another document, or it could have just not existed. So that's why I'm hesitating.  Yes, you could piece back the information to say at what point in time did we add it in there. Yes. I just don't know	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes.  Q. Now, why do you refer to this as a supplemental letter?  A. Because it is not coming from a direct letter coming out of our servicing system. So it doesn't come directly out of FDR, CLASS. It supplements our correspondence. It isn't necessarily sent to a hundred percent of our customers, unlike what might be coming off the servicing system. We may target a certain population of customers that would get this letter.  As an example, if a customer has already been reported to the credit bureau, we may choose not to send this because it doesn't influence that customer as much as a customethat's never been reported.  Q. How can you tell this doesn't come out of the servicing system? What is it about it?  A. One, I know the letter. The other	of n ve t
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	correct?  A. Possibly.  Q. If it's in the procedures now and it wasn't in the procedures before, then at some point it must have been added to the procedures.  MR. FARRELL: I'll stipulate to that.  BY MR. BURGE:  Q. I don't want to argue with you about this, but if it seems like if you have procedures that are in it now and not in it before  A. Yeah, it's just not as simple as did I have it in the procedures and didn't, because it could have been in one set of procedures that got rewritten into another document, or it could have just not existed. So that's why I'm hesitating.  Yes, you could piece back the information to say at what point in time did	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes.  Q. Now, why do you refer to this as a supplemental letter?  A. Because it is not coming from a direct letter coming out of our servicing system. So it doesn't come directly out of FDR, CLASS. It supplements our correspondence. It isn't necessarily sent to a hundred percent of our customers, unlike what might be coming off of the servicing system. We may target a certain population of customers that would get this letter.  As an example, if a customer has already been reported to the credit bureau, we may choose not to send this because it doesn't influence that customer as much as a customethat's never been reported.  Q. How can you tell this doesn't come out of the servicing system? What is it about it?  A. One, I know the letter. The other part of it, it does not have the letter code	of n ve t

### Confidential

Page 217   Patricia P, Paterson   Page 218	1 the bottom. 2 Q. What is the letter code in Exhibit 1? 3 A. D.655. 4 Q. You're right. Okay. Let me show you 5 another letter that think does have a letter of code. We will mark this Peterson 13. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Definguency notice for the customer. 14 Q. And this, if you see at the bottom. 15 has that letter code. I have a hard time in the marked of the servicing system? 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson 1 reflected in the correspondence in the file—2 A. Yes. 23 Q. Tas she D023? 4 A. Yes. 20 Q. Nay, Do you know if the content of this letter has changed over time? 7 A. More than likely, yes. 29 Q. Now, the disclosures at the bottom which letter has changed over time? 20 A. Yes. 21 Q. Now, the disclosures at the bottom which letter hooked like each time it own an attempt to collect a debt. Information obtained will be used for that purpose, "do you know if that language has been in the—1 cach version of the document? 21 A. Yes, and that has been the purpose of the event that causes this document to be sent is an D23 letter dating back to, so, and that is a letter and comment? 2 D. The purpose of the deventment? 2 D. What is this document? 2 D. The purpose of the event that thas been the purpose, of the cevent that class the least to 2005. 3 D. Zes and that has been the purpose, of the event that class the least to 2005. 4 A. Yes. 5 Q. Okay, Do you know if the content of this letter to collect on a through the purpose, of the purpose, of the purpose, of the purpose, of the purpose of th	Navient Solutions, LLC,		<b>September 19, 2017</b>
2 Q. What is the letter code in Exhibit 1? 3 A. L05S. 4 Q. You're right. Okay. Let me show you 5 another letter that I think does have a letter 6 code. We will mark this Peterson 13. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Pes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 6 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Way. Do you know if the content of 6 this letter has changed over time? 26 A. Yes. 27 Q. Now, this document, to the event that causes this document to be sent is 28 an attempt to fledinquency 29 A. It's a certain number of delinquency 20 A. Yes. 21 Q. And this is document? 22 A. A. Yes. 23 Q. It's sent out automatically or does 24 Q. And when this letter is sent, it's 26 Q. Now, this document, what is the the event that causes this document, I 29 Complete the test erise the following at another document, I 20 Complete the test erise the time to the content of the one that is sent to any 21 to don't know which letter D023 is in the cycle. 26 Q. Okay. But it's sent to any 27 of days after a loan goes delinquent, correct? 28 A. Yes. 29 Q. Nay show if the content of 29 Complete that complete the probability of the content of 29 the probability of the content of the content of 29 the probability of the content of 29 the probability of the content of the content of 29 the probability of the content of the content of 29 the probability of the content of	2 Q. What is the letter code in Exhibit 1? 3 A. L055. 4 Q. You're right. Okay. Let me show you 5 another letter that I think does have a letter 6 code. We will mark this Peterson 13. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 6 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Particia P. Peterson Page 218  1 reflected in the correspondence in the file 2 A. Yes. 2 Q. Naw, the disclosures at the bottom 3 D23 letter dating back at least to 2005. 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. Wors. 2 Q. Now, the disclosures at the bottom 3 D23 letter dating back at least to 2005. 4 A. Yes. 5 Q. Now, this document, what is the - the covent that causes this document to be sent is 6 cevent that causes this document to be sent is 7 an account switching over from current to 8 delinquent? 9 A. If s a certain number of delinquency 10 days. Without looking at another document, I couldn't tell you what date we triggered this 12 letter. 13 Q. Somewhere probably between 15 and 60? 14 A. Again, without looking at theI 15 don't know which letter D023 is in the cyte. 10 Q. So, But it's ent out some number of days after a loan goes delinquent; 21 out? 21 A. Yes. 22 Q. Ard when this letter is sent, it's 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Okay. Do you know if the content of 6 this letter is colored in the file 2 A. Yes. 26 Q. Nay. But Navient would have copies of what t	Patricia P. Peterson	Page 217	Patricia P. Peterson Page 219
3 A. LASS. 4 Q. You're right. Okay. Let me show you 5 another letter that I think does have a letter 6 code. We will mark this Peterson 13. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you know fi the content of this letter has being down this letter is sent, it's 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, has that letter code. I have a hard time making it out here. Maybe it's like a D? 17 A. Looks like it might be DD23. 19 Q. And this is one that is sent to any 22 borrower who is delinquent? 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Okay. But with the content of this letter has changed over time? 2 A. Yes. 2 Q. Way as at the given time? 2 A. Yes. 3 Q. Okay. But Navient would have copies of this letter has changed over time? 2 A. Yes. 3 Q. Now, this document, what is the the 6 event that causes this document to be sent is 6 event that causes this document to be ent is the the 6 event that causes this document to be sent is 7 Q. Now, this document to be sent is 6 event that causes this document to be ent is 6 event that causes this document to be delinquent?  9 A. It's a certain number of delinquency 10 days. Without looking at another document, 1 11 couldn't tell you what date we triggered this 12 letter. 13 Q. Somewhere probably between 15 and 60? 14 A. Again, without looking at another document, 1 15 don't know which letter D23 is in the cycle. 16 Q. Okay. But it's sent out some number 17 of days after a loan goes delinquent, correct? 18 A. Yes. 19 Q. Is is sent out automatically or does 19 Q. Is is sent out automatically or does 19 Q. Is it sent out automatically for any 19 Q. Is it sent out automatically for any 19 Q. Is an it will be used for that purpose, "do 10 purpose provided in the content of 6 purpose provided in the content of 6 purpose provided in the content of 6 purpose p	3 Å. L055. 4 Q. You're right. Okay. Let me show you somether letter that I think does have a letter code. We will mark this Peterson 13. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 19 Q. Is it sent out automatically or does 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 22 horrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 10 control of this letter has changed over time? 11 A. Yes. 22 Q. Now, the disclosures at the bottom 3 which says, "Important Disclosures," "This is a nattempt to collect a debt. Information 5 obtained will be used for that purpose," do 15 op was how if that language has been in the -1 cach version of the document? 10 collect a debt. Information 5 obtained will be used for that purpose," do 15 op was marked for identification.) 18 WR. FARRELL: Oh. Is it 31? 18 MR. BURGE: 31 in fact. 19 MR. B	1 the bottom.		1 A. Yes.
4 Q. You're right. Okay. Let me show you 5 another letter that I think does have a letter code. We will mark this Peterson 13. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time making it out here. Maybe it's like a D? 77 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. and this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Okay. Do you know if the content of 6 this letter has changed over time? 27 A. More than likely, yes. 28 Q. Okay. But Navient would have copies 29 of what this letter looked like each time it 20 was – at the given time? 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is 24 an attempt to collect a debt. Information 25 obtained will be used for that purpose," do 26 you know if that language has been in the 27 each version of the document? 28 A. For what period of time? 29 Q. Dainig back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 20 Q. But at some point it was added. The	4 A. Yes. 5 another letter that I think does have a letter code. We will mark this Peterson I3. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly of out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrover who is delinquent? 22 A. Yes. 23 Q. And when this letter is sent, it's 24 Q. And when this letter is sent, it's 25 Q. Okay. Do you know if the content of 6 this letter has changed over time? 26 A. Yes. 27 Q. Okay. Dut Navient would have copics 9 of what this letter looked like each time it was - at the given time? 29 Q. Now, the disclosures at the bottom 33 which says, "Important Disclosures," "This is 4 an attempt to collect a debt. Information obtained will be used for that purpose," do 50 you know if that language has been in the	<b>2</b> Q. What is the letter code in Exhibit 1?		2 Q. And that has been the purpose of the
5 A visc. 15 Q. Now, this document, what is the —the 17 (Peterson Deposition Exhibit 18 No. 13 was marked for identification.) 19 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Okay. Do you know if the content of 6 this letter has changed over time? 26 A. Yes. 27 Q. And when this letter looked like each time it 10 was — at the given time? 28 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was — at the given time? 29 Q. Davin by MR. BURGE: 20 Q. Now, the disclosures at the bottom 21 Davin that are provided the content of 6 this letter has changed over time? 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 do what this letter looked like each time it 10 was — at the given time? 24 A. Wes. 25 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was — at the given time? 26 A. Yes. 27 Q. Now, the disclosures at the bottom 15 obtained will be used for that purpose, "do you know if that language has been in the—17 each version of the document? 26 A. For what period of time? 27 A. Look given the content of 18 A. For what period of time? 28 A. For what period of time? 29 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was added. The 20 Q. So do you recognize this document? 21 A. Yes. 22 Q. What is this document? 23 Q. Now, this document? 24 Conductive this deciment to the event manumber of delinquency design the —1 1 couldn't tell you what date we triggered this 12 center. 24 O. A Yes. 16 Q. Okay. But it have a bard time to couldn't tell you what thate we triggered this 12 cente	sanother letter that I think does have a letter 6 code. We will mark this Peterson 13. 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 A. Ves. 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 10 A. Yes. 11 Q. And this is one that is sent to any 12 borrower who is delinquent? 13 A. Yes. 14 Q. And when this letter is sent, it's 15 particle P. Peterson 16 page 218 1 reflected in the correspondence in the file— 2 A. Yes. 3 Q. — as the D023? 4 A. Yes. 3 Q. — as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likeby, yes. 8 Q. Okay. But Navient would have copics 9 of what this letter looked like each time it owns—at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is a matempt to collect a debt. Information 13 which says, "Important Disclosures," "This is a matempt to collect a debt. Information 15 MR. FARRELL: Oh, Is if 31? 16 Primoking at in upside-down. 17 MR. BURGE: 13 in fact. 18 MR. BURGE: 13 in fact. 19 Q. Dating back to, say, 2005. 20 Q. But at some point it was added. The 21 purpose of this letter is to collect on a 22 Q. Dow, the disclosures added. The 23 purpose of this letter is collect on a 24 Q. Adin, a training reference for our	3 A. L055.		3 D23 letter dating back at least to 2005.
6 event that causes this document to be sent is 7 (Peterson Deposition Exhibit 7 an account switching over from current to 8 delinquent? 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 10 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 29 and the this letter is sent, it's 21 reflected in the correspondence in the file— 2 A. Yes. 3 Q. —as the D023? 4 A. Yes. 3 Q. —as the D023? 4 A. Ves. 3 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 9 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 0 was—at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is a natempt to collect a debt. Information 15 obtained will be used for that purpose," do you know if that language has been in the—are ach version of the document? 18 A. For what period of time? 19 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 12 know will this document? 21 A. Yes. 22 Q. But at some point it was added. The 24 C. So do you recognize this document? 25 do you know if that anguage has been in the—are ach version of the document? 26 A. For what period of time? 27 A. It was added at some point. I don't 12 know if it was prior to 2005 or after 2005. 28 Q. Dat at some point it was added. The 29 Q. Dating back to, say, 2005. 29 Q. But at some point it was added. The 20 Q. So do you recognize this document? 21 A. Yes. 22 Q. What is this document? 23 A. Yes. 24 Q. So do you recognize this document? 25 Document to the content of 15 man account a time the proper in the proper in th	6 code. We will mark this Peterson 13, 7 (Peterson Deposition Exhibit 8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Definquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrover who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Okay. Do you know if the content of 6 this letter has changed over time? 26 A. Yes. 27 Q. Okay. Do you know if the content of 6 this letter has changed over time? 28 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was - at the given time? 29 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was - at the given time? 30 Q. Do you know if that language has been in the - each version of the document? 31 A. Yes. 32 Q. Do you know if that language has been in the - each version of the document? 32 A. For what period of time? 33 Q. Dating back to, say, 2005. 34 A. For what period of time? 35 Q. Dating back to, say, 2005. 36 Q. Dating back to, say, 2005. 37 Q. Dating back to, say, 2005. 38 Q. Dating back to, say, 2005. 39 Q. Dating back to, say, 2005. 30 Q. Dating back to, say, 2005. 31 Q. Dating back to, say, 2005. 32 Q. But at some point it was added. The 23 purpose of this letter is to collect on a	4 Q. You're right. Okay. Let me show you		4 A. Yes.
7 an account switching over from current to 8 No. 13 was marked for identification.) 9 BY MR BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom. 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 borrower who is delinquent? 26 A. Yes. 27 Q. And when this letter is sent, it's 28 A. Yes. 29 borrower who is delinquent? 29 borrower who is delinquent? 20 borrower who is delinquent? 21 out? 22 have a sent bolo23? 23 Q. a set bolo23? 24 A. Yes. 25 Q. Okay. Do you know if the content of 6 this letter has changed over time? 26 this letter has changed over time? 27 A. More than likely, yes. 28 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was – at the given time? 29 of what this letter looked like each time it 10 was – at the given time? 21 A. Yes. 22 Q. Now, the disclosures at the bottom 15 obtained will be used for that purpose," do you know if that language has been in the – 17 each version of the document? 21 k. FARRELL: Oh. Is it 31? 21 loady what this letter has dedied to time? 22 A. A tres. 23 Q. Osay. Do you know if that language has been in the – 19 each version of the document? 24 loady. Without looking at another document, 1 couldn't tell you what date we triggered this couldn't tell you what date we triggered th	7 an account switching over from current to 8 No. 13 was marked for identification.) 9 By MR, BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter looks and the content of this letter has changed over time? 24 A. Yes. 25 Q. Way. Do you know if the content of this letter has changed over time? 26 A. Yes. 27 Q. Nay, But Navient would have copies of what this letter looked like each time it obtained will be used for that purpose," do to obtained will be used for that purpose, do to obtained will be used	5 another letter that I think does have a letter		5 Q. Now, this document, what is the the
8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. May. But it's sent out automatically or does 27 somebody have to make a decision to send it 28 Q. This is a letter that comes directly 29 out of the servicing system? 20 A. Yes. 21 Q. and this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 26 Okay. Do you know if the content of 6 this letter has changed over time? 27 A. More than likely, yes. 28 Q. Okay. But it's sent out automatically or does 29 somebody have to make a decision to send it 21 out? 22 A. Automatically. 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Patricia P. Peterson 26 Page 218 Patricia P. Peterson 27 A. Wes. 28 Q. Okay. Du you know if the content of 6 this letter has changed over time? 29 of what this letter looked like each time it 20 was – at the given time? 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 A. Yes. 24 Q. Now, the disclosures at the bottom 25 Okay. Bun Navient would have copies 26 of what this letter is sent, it's 27 A. More than likely, yes. 39 Q. Daing back to, say, 2005. 30 A. It was added at some point. I don't 31 MR. BURGE: These have no meaning, unfortunately. 32 A. It was added at some point. I don't 33 C. It was added at some point. I don't 44 A. Yes. 45 C. Okay. But it was prior to 2005 or after 2005. 46 A. Yes. 47 A. Okaya. But at some point it was added. The 48 C. The with the time of the document? 49 C. Daing back to, say, 200	8 No. 13 was marked for identification.) 9 BY MR. BURGE: 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 26 Life the correspondence in the file— 2 A. Yes. 27 Q. Now, the disclosures at the bottom 28 Q. Okay. But Navient would have copies 39 of what this letter looked like each time it 30 was—at the given time? 31 A. Yes. 32 Q. Now, the disclosures at the bottom 33 which says, "Important Disclosures," "This is a nattempt to collect a debt. Information obtained will be used for that purpose," do 30 you know if that language has been in the— 22 a. Yes an attempt to collect a debt. Information obtained will be used for that purpose," do 30 you know if that language has been in the— 31 A. Yes. 32 Q. This was added at some point. I don't 32 know if that language has been in the— 34 A. For what period of time? 35 Q. Dating back to, say, 2005. 36 Q. Dating back to, say, 2005. 37 Q. Dating back to, say, 2005. 38 Q. Dating back to, say, 2005. 39 purpose of this letter is to collect on a 31 whis this document? 31 A. Yes. 32 Q. But at some point it was added. The 33 purpose of this letter is to collect on a	6 code. We will mark this Peterson 13.		6 event that causes this document to be sent is
9 A. It's a certain number of delinquency 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it ou here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 19 Q. Is it sent out automatically or does 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 26 A. Yes. 27 Q. Now, the disclosures at the bottom 28 A. Yes. 39 Q as the D023? 40 A. Yes. 41 Q. Okay. Do you know if the content of 65 this letter has changed over time? 41 A. Yes. 42 Q. Now, the disclosures at the bottom 43 which says, "Important Disclosures," "This is a attempt to collect a debt. Information obtained will be used for that purpose," do 10 you know if that language has been in the -12 each version of the document? 29 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't language has been in the -12 each version of the document? 21 know if it was prior to 2005 or after 2005. 22 Q. What is this document? 23 Q. What is this document? 24 know if it was prior to 2005 or after 2005. 25 Q. What is this document? 26 A. Yes. 29 Q. What is this document? 29 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't you know if this document? 21 know if it was prior to 2005 or after 2005. 22 Q. What is this document? 23 A. Yes. 24 Q. What is this document? 25 don't know which letter pouds die the -1 1 the customer probably between 15 and 60? 26 A. Yes. 27 Q. Now, the disclosures at the bottom the file -1 out? is sent out automatically or does somebody have to make a decision to send it out? 26 Journal at the -1 out? is sent out automatically or does somebody have to make a decision to send it out? 29 Q. Dating back to, say, 2005. 20 A. It was added	9 A. It's a certain number of delinquency 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be Do23. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson Page 218  Patricia P. Peterson Page 219  Patricia P. Peterson Page 210  1 reglected in the correspondence in the file— 2 A. Yes. 2 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was—at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 4 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the— 2 each version of the document? 18 A. Yes. 19 Q. Is at it's act out automatically or does 20 Sone body have to make a decision to send it 21 out? 21 regardless of whether or not the borrower 22 previously had a bankruptcy? 23 M. F. FARELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY Mr. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 10 No. 14 was marked for identification.) 11 MR. FARRELL: You took 12 Exhibit 13." 13 "Exhibit 13." 14 MR. BURGE: 31 in fact. 15 I'm looking at it upside—down. 16 MR. FARRELL: Object to the 17 MR	7 (Peterson Deposition Exhibit		7 an account switching over from current to
10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson Page 218 Patricia P. Peterson Page 228 Patricia P. Peterson Page 220 Patricia P. Peterson Page 220 Retricia P. Peters	10 Q. Do you recognize this document? 11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 27 A. Yes. 28 Q. Okay. Do you know if the content of 6 this letter has changed over time? 29 A. More than likely, yes. 21 Q. Now, the disclosures at the bottom 22 borrower who is delinquent? 23 A. Yes. 24 Q. Now, the disclosures at the bottom 25 O Okay. But via sent to any 26 Do Kay. But a view to make a decision to send it 21 out? 27 A. Yes. 28 Q. Okay. Do you know if the content of 6 this letter has changed over time? 29 of what this letter looked like each time it 10 was—at the given time? 21 Q. Now, the disclosures at the bottom 22 bottom the servicing system? 23 A. Yes. 24 Q. Now, the disclosures at the bottom 25 of what this letter is been in the—each version of the document? 26 A. Yes. 27 A. Wore than likely, yes. 28 Q. Okay. But alvien would have copies of what his letter looked like each time it 10 was—at the given time? 29 A. Yes. 21 Q. Now, the disclosures at the bottom 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is an attempt to collect a debt. Information of the very large than the—each version of the document? 21 A. Yes. 22 Q. Now are the given time? 23 A. For what period of time? 24 Joan you're still actively servicing. 25 Patricia P. Peterson 26 Page 218 27 A. More than likely, yes. 28 Q. Okay. But alvient would have copies of whather or not the borrower proviously had a bankruptcy? 29 A. More than likely, yes. 30 A. He Without looking at the—1 31 Go. Viavy But it's sent out automatically for does somebo	8 No. 13 was marked for identification.)		8 delinquent?
11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 27 Patricia P. Peterson 28 Q. as the D023? 39 Q. as the D023? 4 A. Yes. 50 Q. Okay. Do you know if the content of 6 this letter has changed over time? 51 A. Wes. 52 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was — at the given time? 51 A. Yes. 52 Q. Now, the disclosures at the bottom 53 which says, "Important Disclosures," "This is an attempt to collect a debt. Information 50 botained will be used for that purpose," do for you know if that tanguage has been in the — 12 each version of the document? 51 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 20 Q. But at some point it was added. The 21 Couldn't tell you what date we triggered this 12 letter. 22 Q. What is this document? 23 Q. Somewhere probably between 15 and 60? 24 A. Again, without looking at the — I 26 O. Cay. But it some ommember 26 O. Cay. But now the disclosures and the mide — 22 or of days after a loan goos delinquent, correct? 29 C. But at some point it was added. 20 Now, the disclosures at the bottom 21 A. Yes. 22 Q. But at some point it was added. The 21 Couldn't tell you what date we triger will and the F. I 21 A. A. Again, without looking at the F. I 24 A. A. Again, without looking at the F. I 26 O. Cay. But it some number 26 O. Cay. But it some number 27 of days after a loan goos delinquent, correct? 29 So do yay it is sent out some number 29 O. This is ent out some number 29 O. This is ent out summenter 29 O. This is an etter bat comes directly and out? 20 O.	11 A. Yes. 12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making if out there. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 26 Patricia P. Peterson 27 A. Yes. 28 Q. Okay. Do you know if the content of 6 this letter has changed over time? 29 A. Yes. 20 Q. Now, the disclosures at the bottom 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is a nattempt to collect a debt. Information of you know if that language has been in the	9 BY MR. BURGE:		9 A. It's a certain number of delinquency
12 Q. What is this document?  13 A. Delinquency notice for the customer.  14 Q. And this, if you see at the bottom,  15 has that letter code. I have a hard time  16 making it out here. Maybe it's like a D?  17 A. Looks like it might be D023.  18 Q. This is a letter that comes directly  19 out of the servicing system?  19 out of the servicing system?  20 A. Yes.  21 Q. And this is one that is sent to any  22 borrower who is delinquent?  23 A. Yes.  24 Q. And when this letter is sent, it's  24 Q. And when this letter is sent, it's  25 Patricia P. Peterson  26 A. Yes.  27 Q. Ayes.  28 Q. Okay. Do you know if the content of 6 this letter has changed over time?  29 A. Wore than likely, yes.  20 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was - at the given time?  10 A. Yes.  11 Q. Sand when this letter of the furnosion obtained will be used for that purpose," do 15 obtained will be used for that purpose," do 15 obtained will be used for that purpose," do 5 obtained will be used for that purpose," do 15 obtained will be used for that purpose," do 15 obtained will be used for that purpose," do 20 Q. Dating back to, say, 2005.  20 A. It was added at some point, I don't 2 know if it was prior to 2005 or after 2005.  20 Q. But at some point it was added. The  21 Land Making it out here. Maybe it's like a D?  22 D. Wat it shert out some number of 15 don't know which letter D023 is in the cycle.  24 O. Okay. But like out out out outcantically or does 20 somebody have to make a decision to send it 21 out?  24 O. Automatically.  25 A. Automatically.  26 D. Somebare a loan goes delinquent, correct?  27 A. Loan and goes delinquent, correct?  28 A. Yes.  29 Patricia P. Peterson  20 Patricia P. Peterson  21 Patricia P. Peterson  22 Peterson Peagadless of whether or not the borrower 2 2 2 2 2 2 2 3 MR. FARRELL: Object to the 4 form.  25 Pagradless of whether or not the borrower 2 2 2 2 2 2 3 MR. FARRELL: Object to the 4 form.  20 Patricia P. Peterson Peagadless of whether or not the bo	12 Q. What is this document? 13 A. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making if out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 19 Out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Automatically. 26 A. Yes. 27 Q. And when this letter is sent, it's 28 Q. Okay. But havient would have copies 29 of what this letter looked like each time it was a at the given time? 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is a nattempt to collect a debt. Information of bottained will be used for that purpose," do syou know if that language has been in the each version of the document? 21 R. Yes. 22 Q. Dating back to, say, 2005. 23 Q. But at some point. I don't last one point it was added. The purpose of this letter is to collect on a 24 loan you're still actively servicing, 25 lotter. 26 Q. Okay. But in sent out automatically or does one who is decision to send it out? 26 A. Yes. 27 A. Automatically. 28 A. Yes. 29 C. So whether or not the borrower previously had a bankruptcy? 29 D. Petrical P. Peterson 20 Patricia P. Peterson 21 regardless of whether or not the borrower previously had a bankruptcy? 22 M. R. FARRELL: Object to the form. 23 D. Herry M. B. URGE: These have no meaning, unfortunately. 29 D. Dating back to, say, 2005. 20 A. H. was added at some point it was added. The provious of the collect on a collection and the collection and t	<b>10</b> Q. Do you recognize this document?		10 days. Without looking at another document, I
13 Q. And this, if you see at the bottom, 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 10 A. Yes. 11 Q. And this is one that is sent to any 12 borrower who is delinquent? 13 A. Yes. 14 Q. And when this letter is sent, it's 15 Q. This sent out automatically or does 16 Q. Okay. But it's sent out some number 17 of days after a loan goes delinquent, correct? 18 A. Yes. 19 Q. Is it sent out automatically or does 20 somebody have to make a decision to send it 21 out? 22 A. Automatically. 23 A. Yes. 24 Q. And when this letter is sent, it's 24 loan you're still actively servicing, 25 Q. Okay. But Navient would have copies 26 of what this letter losed like each time it 27 A. Wore than likely, yes. 28 Q. Okay. But Navient would have copies 29 of what this letter losed like each time it 20 was — at the given time? 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is 24 an attempt to collect a debt. Information 25 Obtained will be used for that purpose," do 26 you know if that language has been in the — 27 each version of the document? 28 A. It was added at some point. I don't 29 Q. Dating back to, say, 2005. 20 Q. But at some point it was added. The	13 Å. Delinquency notice for the customer. 14 Q. And this, if you see at the bottom, 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 Å. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 Å. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 Å. Yes. 24 Q. And when this letter is sent, it's  25 A. Yes. 26 Q. And when this letter is sent, it's  26 A. Yes. 27 Q. and when this letter is sent, it's  27 A. Yes. 28 Q. Cay. Do you know if the content of 6 this letter has changed over time? 29 A. A. Yes. 29 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was – at the given time? 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is an attempt to collect a debt. Information 15 obtained will be used for that purpose," do you know if the danguage has been in the — 17 each version of the document?  28 A. For what period of time? 29 Q. Daing back to, say, 2005. 20 A. It was added at some point. I don't to was added. The 20 And this is chief to bottom 12 know if it was prior to 2005 or after 2005. 20 Q. What is this document? 21 A. Again, a training reference for our			11 couldn't tell you what date we triggered this
14 A. Again, without looking at the — I 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. Ayes. 27 A. Looks like it might be D023. 28 A. Wes. 29 A. Yes. 29 Q. It's sent out automatically or does 29 somebody have to make a decision to send it 20 out? 20 borrower who is delinquent? 21 out? 22 A. Automatically. 23 A. Yes. 24 Q. And when this letter is sent, it's 24 loan you're still actively servicing, 25 Patricia P. Peterson 26 A. Yes. 27 Peterson 28 Page 218 Patricia P. Peterson 29 Page 220 20 Patricia P. Peterson 20 Page 220 21 reflected in the correspondence in the file — 22 A. Yes. 23 Q. — as the D023? 24 A. Yes. 25 Peterson 26 Page 27 Previously had a bankruptcy? 27 A. More than likely, yes. 28 Q. Okay. Do you know if the content of 6 this letter has changed over time? 29 G. Now, the disclosures at the bottom 20 Which says, "Important Disclosures," "This is an attempt to collect a debt. Information obtained will be used for that purpose," do 15 you know if that language has been in the — 29 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 2 know if it was prior to 2005 or after 2005. 21 Row until was a sided at some point. I don't 2 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The	14 A. Again, without looking at the - I 15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. Aud when this letter is sent, it's 26 Patricia P. Peterson 27 A. Yes. 28 Q. as the D023? 29 A. Yes. 20 Chay. Do you know if the content of 6 this letter has changed over time? 29 A. Wore than likely, yes. 30 Q. as the D023? 4 A. Yes. 4 Q. And when this letter looked like each time it 10 was - at the given time? 4 A. Yes. 5 Q. Okay. But Navient would have copies of what this letter looked like each time it 10 was - at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is obtained will be used for that purpose," do 16 you know if that language has been in the - 17 each version of the document? 11 A. For what period of time? 12 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 21 Q. Dating back to, say, 2005. 22 Q. What is this document? 23 A. Again, a training reference for our	<b>12</b> Q. What is this document?		12 letter.
15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 A. Yes. 27 Q. And when this letter is sent, it's 28 A. Yes. 29 Q. Is's sent out automatically or does 29 ownebody have to make a decision to send it 21 out? 21 out? 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing, 26 Patricia P. Peterson 27 Page 218 28 Patricia P. Peterson 29 Page 218 20 Patricia P. Peterson 20 Page 218 21 reflected in the correspondence in the file—2 20 Patricia P. Peterson 21 regardless of whether or not the borrower 22 previously had a bankruptcy? 23 A. Yes. 24 O. Okay. Do you know if the content of 25 this letter has changed over time? 26 Patricia P. Peterson 27 Page 218 28 Patricia P. Peterson 29 Owner than likely, yes. 30 Patricia P. Peterson 40 Page 220 41 reflected in the correspondence in the file—4 form. 52 Q. Okay. Do you know if the content of form. 53 THE WITNESS: Correct. 64 BY MR. BURGE: 65 BY MR. BURGE: 75 Owner than likely, yes. 76 Page 218 76 Patricia P. Peterson 77 Page 220 78 Patricia P. Peterson 89 Owner than likely, yes. 80 Patricia P. Peterson 80 Page 220 80 Patricia P. Peterson 80 Page 220 90 Patricia P. Peterson 91 regardless of whether or not the borrower 92 previously had a bankruptcy? 91 Patricia P. Peterson 92 Page 220 93 Patricia P. Peterson 94 Patricia P. Peterson 95 Page 220 96 Patricia P. Peterson 96 Page 220 97 Patricia P. Peterson 96 Page 220 97 Patricia P. Peterson 97 Page 220 98 Patricia P. Peterson 99 Page 220 99 Patricia P. Peterson 99 Page 220 90 Page 218 90 Patricia P. Peterson 90 Page 220 91 Patricia P. Peterson 91 P	15 has that letter code. I have a hard time 16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. Ayes. 27 Patricia P. Peterson 28 Q. Ares. 29 Patricia P. Peterson 29 Page 218 20 Treflected in the correspondence in the file 2 A. Yes. 3 Q as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is an attempt to collect a debt. Information obtained will be used for that purpose," do you know if that language has been in the 17 each version of the document? 21 A. Yes. 22 Q. But at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The 23 purpose of this letter is to collect on a  15 don't know which letter load at out some number of of of days after a loan goes delinquent, correct? 16 Q. Okay. But it's sent out automatically or does 20 somebody have to make a decision to send it 2 out? 22 A. Automatically. 23 A. Yes. 24 A. Automatically. 25 A. Automatically or does 20 somebody have to make a decision to send it 2 out? 26 A. Automatically. 27 A. Automatically or does 20 liver? 28 A. Automatically or does 20 somebody have to make a decision to send it 2 out? 29 Patricia P. Peterson 29 District P. Peterson 20 District P. Peterson 20 District P. Peterson 21 District P. Peterson 22 A. Automatically or does 20 out? 23 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005.			
16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 19 Q. Is it sent out automatically or does 20 somebody have to make a decision to send it 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 26 Patricia P. Peterson 27 A. Yes. 28 Q. Okay. Do you know if the content of its letter has changed over time? 29 A. Aves. 20 Given the his letter has changed over time? 20 A. Yes. 21 Patricia P. Peterson 22 Patricia P. Peterson 23 Q. reas the D023? 24 A. Yes. 25 Q. Okay. Do you know if the content of its letter has changed over time? 26 A. Yes. 27 A. More than likely, yes. 28 Q. Okay. But Navient would have copies of what this letter looked like each time it 29 Q. Now, the disclosures at the bottom 21 A. Yes. 21 Q. Now, the disclosures at the bottom 22 Q. Now, the disclosures, "This is an attempt to collect a debt. Information obtained will be used for that purpose," do 29 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't each version of it was a rior to 2005 or after 2005. 29 Q. But at some point it was added. The  16 Q. Okay. But it is sent out automatically or does 20 somebody have to make a decision to send it 21 out? 21 A. Automatically. 22 A. Automatically. 23 Q. Is's sent out automatically for any 24 loan you're still actively servicing,  24 form. 25 Peterson 26 Patricia P. Peterson 27 Page 220  28 Patricia P. Peterson 28 Patricia P. Peterson 29 Page 220  20 Ir regardless of whether or not the borrower previously had a bankruptcy?  30 MR. FARRELL: Object to the form. 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 9 (Peterson Deposition Exhibit 10 Was — at the given time? 11 mlooking at it upside-down. 12 Im looking at it upside-down. 13 WR. FARRELL: Oh. Is it 31? 14 MR. BURGE: 1	16 making it out here. Maybe it's like a D? 17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 A. Yes. 26 Q. And when this letter is sent, it's 27 Patricia P. Peterson 28 A. Yes. 29 Q. This is a better that comes directly 29 A. Yes. 21 Q. And when this letter is sent, it's 21 Q. And when this letter is sent, it's 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing. 25 Patricia P. Peterson 26 Page 218 27 Peterson 28 Q. Okay. But Navienth would have copies of what this letter looked like each time it 29 Q. Now, the disclosures at the bottom 21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is an attempt to collect a debt. Information obtained will be used for that purpose," do 20 you know if that language has been in the	<b>14</b> Q. And this, if you see at the bottom,		14 A. Again, without looking at the I
17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's 25 Q. It's sent out automatically. 26 A. Yes. 27 Q. And when this letter is sent, it's 28 A. Yes. 29 Q. It's sent out automatically for any 29 Loan you're still actively servicing, 29 Patricia P. Peterson 20 Page 210 21 reflected in the correspondence in the file— 21 A. Yes. 22 Q. Okay. Do you know if the content of 6 this letter has changed over time? 23 A. Yes. 34 A. Yes. 45 Q. Okay. Do you know if the content of 6 this letter has changed over time? 46 A. Yes. 47 A. More than likely, yes. 48 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was—at the given time? 19 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the—e 2 each version of the document? 28 A. For what period of time? 29 Q. Dating back to, say, 2005. 20 A. Wes. 21 Q. Have a decision to send it 2001. 22 A. Automatically. 23 A. Yes. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing. 24 D. Automatically. 25 A. Automatically. 26 A. Automatically. 27 A. Mutomatically. 28 A. Automatically. 29 A. Automatically. 21 A. Yes. 21 periods of whether or not the borrower 2 previously had a bankruptcy? 21 fregardless of whether or not the borrower 2 previously had a bankruptcy? 22 M. FARRELL: Object to the 4 form. 24 form. 25 Patricia P. Peterson 26 Patricia P. Peterson 27 Page 220 28 M.R. FARRELL: Object to the 4 form. 28 M. FARRELL: Object to the 4 form. 29 (Peterson Deposition Exhibit 10 No. 14 was marked for identification.) 30 M.R. FARRELL: Oh. Is it 31? 31 "Exhibit 13." 32 M.R. BURGE: 31 in fact. 33 "Exhibit 14 out of your folder labeled 11 marked propose, 12 min fact. 34 M.R.	17 A. Looks like it might be D023. 18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  25 A. Yes. 26 Q. And when this letter is sent, it's  27 Patricia P. Peterson 28 Q. — as the D023? 29 A. Yes. 20 Q. — as the D023? 30 Patricia P. Peterson 40 Page 218 4 A. Yes. 4 A. Yes. 4 Q. — as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 6 A. More than likely, yes. 8 Q. Okay. Do you know if the content of 6 this letter looked like each time it 10 was — at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the — 2re each version of the document? 21 A. For what period of time? 22 Q. An atomatically or does 2 somebody have to make a decision to send it 21 out? 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing,  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  1 regardless of whether or not the borrower 2 previously had a bankruptcy?  3 MR. FARRELL: Object to the 4 form.  5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit No. 14 was marked for identification.)  MR. FARRELL: You took 12 Exhibit 14 out of your folder labeled 13 "Exhibit 14.0" 14 MR. BURGE: These have no meaning, unfortunately. 15 BY MR. BURGE: 16 You know if it was prior to 2005 or after 2005. 18 Yes. 29 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 20 Q. What is this document? 21 A. Yes. 22 Q. What is this document? 23 A. Again, a training refere	15 has that letter code. I have a hard time		15 don't know which letter D023 is in the cycle.
18 A. Yes.  19 Q. Is it sent out automatically or does  20 A. Yes.  21 Q. And this is one that is sent to any  22 borrower who is delinquent?  23 A. Yes.  24 Q. And when this letter is sent, it's  25 Patricia P. Peterson  26 Page 218 Patricia P. Peterson  27 Page 218 Patricia P. Peterson  28 Page 218 Patricia P. Peterson  29 Page 218 Patricia P. Peterson  20 Page 220  21 reflected in the correspondence in the file  2 A. Yes.  3 Q as the D023?  4 A. Yes.  5 Q. Okay. Do you know if the content of  6 this letter has changed over time?  7 A. More than likely, yes.  8 Q. Okay. But Navient would have copies  9 of what this letter looked like each time it  10 was at the given time?  11 A. Yes.  12 Q. Now, the disclosures at the bottom  13 which says, "Important Disclosures," "This is  4 an attempt to collect a debt. Information  15 obtained will be used for that purpose," do  4 you know if that language has been in the  12 each version of the document?  13 A. For what period of time?  14 MR. BURGE:  15 Im looking at it upside-down.  17 MR. BURGE:  18 M. For what period of time?  19 Q. Dating back to, say, 2005.  20 Q. But at some point it was added. The  18 A. For what period to 2005 or after 2005.  20 Q. But at some point it was added. The	18 Q. This is a letter that comes directly 19 out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  25 Patricia P. Peterson  26 Patricia P. Peterson  27 Patricia P. Peterson  28 Q. Okay. Bo you know if the content of this letter has changed over time?  29 A. Wes. 20 Okay. Do you know if the content of this letter has changed over time?  20 A. Wes. 21 Q. Now, the disclosures at the bottom 22 Q. Now, the disclosures at the bottom 23 which says, "Important Disclosures," "This is an attempt to collect a debt. Information bobtained will be used for that purpose," do you know if that language has been in the each version of the document?  21 A. Yes. 22 Q. Now, the disclosures at the bottom 23 Which says, "Important Disclosures," "This is an attempt to collect a debt. Information bobtained will be used for that purpose," do you know if that language has been in the each version of the document?  21 A. Automatically, out?  22 A. Automatically.  23 Q. It's sent out automatically for any  24 loan you're still actively servicing,  24 Patricia P. Peterson  25 Patricia P. Peterson  26 Patricia P. Peterson  27 Patricia P. Peterson  28 Patricia P. Peterson  29 Patricia P. Peterson  20 Patricia P. Peterson  21 regardless of whether or not the borrower  22 previously had a bankruptcy?  3 MR. FARRELL: Object to the  4 form.  5 THE WITNESS: Correct.  6 BY MR. BURGE:  7 Q. I show you a document which I will  8 mark Peterson 14.  9 (Peterson Deposition Exhibit  10 No. 14 was marked for identification.)  11 MR. FARRELL: You took  12 Exhibit 13."  13 MR. FARRELL: You took  14 MR. BURGE: 31 in fact.  15 MR. FARRELL: Oh. Is it 31?  16 I'm looking at it upside-down.  17 MR. BURGE: These have no  18 meaning, unfortunately.  19 BY MR. BURGE:  20 Q. So do you recognize this document?  21 A. Yes.  22 Q. What is this document?  23 A. Again, a training reference for our	·		16 Q. Okay. But it's sent out some number
19 Out of the servicing system? 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson Page 218  Patricia P. Peterson Page 220  1 reflected in the correspondence in the file 2 A. Yes. 3 Q as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the 17 each version of the document? 18 A. For what period of time? 19 Q. Bat at some point. I don't 20 Now, if the ass added. The  19 Q. Is it sent out automatically or does 20 somebody have to make a decision to send it 21 out? 22 A. Automatically. 23 Q. It's sent out automatically or does 24 loan you're still actively servicing.  Patricia P. Peterson Page 218  Patricia P. Peterson Page 220  1 regardless of whether or not the borrower 2 previously had a bankruptcy? 3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 10 No. 14 was marked for identification.)  MR. FARRELL: You took 12 Exhibit 1.4 out of your folder labeled 13 "Exhibit 1.3"  MR. BURGE: 31 in fact.  MR. BURGE: These have no 18 meaning, unfortunately. 19 BY MR. BURGE: 20 Q. So do you recognize this document? 21 A. Yes. 22 Q. What is this document?	19 Q. Is it sent out automatically or does 20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson Page 218  Patricia P. Peterson Page 220  1 reflected in the correspondence in the file 2 A. Yes. 3 Q as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies of what this letter looked like each time it was at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is an attempt to collect a debt. Information obtained will be used for that purpose," do 16 you know if that language has been in the 17 each version of the document? 18 A. For what period of time? 19 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 2 know if it was prior to 2005 or after 2005. 21 Q. But at some point it was added. The 2 purpose of this letter is to collect on a  19 Q. Is it sent out automatically or ones and it out? 21 out? 22 A. Automatically. 23 Q. It's sent out automatically for any 21 loan you're still actively servicing.  Patricia P. Peterson Page 220  Patricia P. Peterson Page 220  1 regardless of whether or not the borrower 2 previously had a bankruptcy? 3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 1 No. 14 was marked for identification.)  11 MR. FARRELL: You took 12 Exhibit 13."  13 "Exhibit 13."  14 MR. BURGE: 31 in fact.  MR. BURGE: 31 in fact.  MR. BURGE: These have no meaning, unfortunately.  19 Q. Dating back to, say, 2005. 20 A. It was added at some point it was added. The 21 A. Yes. 22 Q. But at some point it was added. The	17 A. Looks like it might be D023.		17 of days after a loan goes delinquent, correct?
20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  1 reflected in the correspondence in the file 2 A. Yes.  3 Q as the D023?  4 A. Yes.  5 Q. Okay. Do you know if the content of 6 this letter has changed over time?  7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time?  11 A. Yes.  12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the 17 each version of the document? 18 A. For what period of time? 19 Q. Dating back to, say, 2005.  20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The  20 uri? 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing,  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whether or not the borrower previously had a bankruptcy?  I regardless of whet	20 A. Yes. 21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  1 reflected in the correspondence in the file 2 A. Yes.  3 Q as the D023?  4 A. Yes.  5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time?  11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the 17 each version of the document?  18 A. For what period of time? 19 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The 23 purpose of this letter is to collect on a  20 somebody have to make a decision to send it 21 out?  22 A. Automatically. 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing,  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  I regardless of whether or not the borrower 2 previously had a bankruptcy?  3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 10 No. 14 was marked for identification.) 11 MR. FARRELL: You took 12 Exhibit 13." 14 MR. BURGE: 31 in fact. 15 MR. FARRELL: Oh. Is it 31? 16 I'm looking at it upside-down. 17 MR. BURGE: These have no 18 meaning, unfortunately. 19 What is this document? 21 A. Yes. 22 Q. What is this document? 23 A. Again, a training reference for our			18 A. Yes.
21 Q. And this is one that is sent to any 22 borrower who is delinquent? 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  1 reflected in the correspondence in the file 2 A. Yes. 3 Q as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the 17 each version of the document? 19 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The  21 out? 22 A. Automatically. 22 A. Automatically. 22 A. Automatically. 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing,  Patricia P. Peterson Page 220  1 reglected in the correspondence in the file 2 previously had a bankruptcy? 3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 10 No. 14 was marked for identification.) 11 MR. FARRELL: You took 12 Exhibit 13." 13 "Exhibit 13." 14 MR. BURGE: 31 in fact. 15 MR. FARRELL: Oh, Is it 31? 16 I'm looking at it upside-down. 17 MR. BURGE: These have no 18 meaning, unfortunately. 19 Q. Dating back to, say, 2005. 20 Q. But at some point it was added. The	21 Out? 22 A. Automatically. 23 A. Yes. 24 Q. And when this letter is sent, it's  24 loan you're still actively servicing,  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 218  1 reflected in the correspondence in the file 2 A. Yes. 3 Q as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do you know if that language has been in the each version of the document? 18 A. For what period of time? 19 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The 23 purpose of this letter is to collect on a  21 out? 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing,  24 loan you're still actively servicing,  25 A. Automatically. 26 A. Automatically. 27 A. Automatically. 28 A. Automatically. 29 A. Automatically. 29 A. Automatically. 21 A. Automatically. 21 A. Automatically. 21 A. Automatically. 22 A. Automatically. 23 Q. It's sent out automatically for any 24 loan you're still actively servicing,  24 loan you're stil actively servicing,  25 A. Automatically. 29 Patricia P. Peterson 20 Page 220  1 regardless of whether or not the borrower 2 previously had a bankruptcy? 3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson Deposition Exhibit 10 No. 14 was marked for identification.) 11 MR. FARRELL: You took 12 Exhibit 14 out of your folder labeled 13 "Exhibit 13." 14 MR. BURGE: These have no 15 MR. FARRELL: Oh. Is it 31? 16 Im looking at it upside-down. 17 MR. BURGE:			19 Q. Is it sent out automatically or does
22 A. Automatically. 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  1 reflected in the correspondence in the file 2 A. Yes. 3 Q as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time? 11 A. Yes. 11 MR. FARRELL: You took 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 16 you know if that language has been in the 17 each version of the document? 19 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The  Page 218 1 loan you're still actively servicing, 24 loan you're still actively servicing,  Patricia P. Peterson Page 220  Patricia P. Peterson Page 220  1 regardless of whether or not the borrower previously had a bankruptcy? 3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit No. 14 was marked for identification.) 11 MR. FARRELL: You took 12 Exhibit 13." 13 "Exhibit 13." 14 MR. BURGE: 31 in fact. 15 MR. FARRELL: Oh. Is it 31? 16 I'm looking at it upside-down. 17 maning, unfortunately. 18 MR. BURGE: These have no meaning, unfortunately. 19 Q. So do you recognize this document? 21 A. Yes. 22 Q. What is this document?	22 A. Automatically. 23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson Page 218  Patricia P. Peterson Page 220  1 reflected in the correspondence in the file— 2 A. Yes. 3 Q. — as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was — at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 15 you know if that language has been in the— 16 a. For what period of time? 19 Q. Dating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The 23 purpose of this letter is to collect on a			20 somebody have to make a decision to send it
23 A. Yes. 24 Q. And when this letter is sent, it's  Patricia P. Peterson  Page 218 Patricia P. Peterson  Page 220  1 reflected in the correspondence in the file 2 A. Yes. 3 Q as the D023? 4 A. Yes. 5 Q. Okay. Do you know if the content of 6 this letter has changed over time? 7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 14 an attempt to collect a debt. Information of botained will be used for that purpose," do 15 you know if that language has been in the 17 each version of the document? 18 A. For what period of time? 19 Q. Dating back to, say, 2005. 20 Q. But at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The  Page 218 loan you're still actively servicing,  Patricia P. Peterson Page 220  Patricia P. Peterson Page 218  Patricia P. Peterson Page 220  Patricia P. Peterson Page 220  A Regardless of whether or not the borrower previously had a bankruptcy?  3 MR. FARRELL: Object to the 4 form.  1 regardless of whether or not the borrower previously had a bankruptcy?  3 MR. FARRELL: Object to the 4 form.  5 THE WITNESS: Correct. 6 BY MR. BURGE:  7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit No. 14 was marked for identification.)  MR. FARRELL: You took Exhibit 13."  14 MR. BURGE: 31 in fact.  MR. BURGE: 31 in fact.  MR. BURGE: These have no meaning, unfortunately.  18 M M. BURGE:  20 Q. So do you recognize this document?  21 A. Yes. 22 Q. What is this document?	23 Q. It's sent out automatically for any 24 Q. And when this letter is sent, it's  Patricia P. Peterson  Page 218  Patricia P. Peterson  Page 220  1 reflected in the correspondence in the file 2 A. Yes.  3 Q as the D023?  4 A. Yes.  5 Q. Okay. Do you know if the content of 6 this letter has changed over time?  7 A. More than likely, yes. 8 Q. Okay. But Navient would have copies 9 of what this letter looked like each time it 10 was at the given time? 11 A. Yes. 12 Q. Now, the disclosures at the bottom 13 which says, "Important Disclosures," "This is 4 an attempt to collect a debt. Information 15 obtained will be used for that purpose," do 19 Qu bating back to, say, 2005. 20 A. It was added at some point. I don't 21 know if it was prior to 2005 or after 2005. 22 Q. But at some point it was added. The 23 purpose of this letter is to collect on a  12 Patricia P. Peterson 12 lean you're still actively servicing,  Page 218 Patricia P. Peterson 12 lean you're still actively servicing,  Page 218 Patricia P. Peterson Page 220 Patricia P. Peterson Page 218 Patricia P. Peterson Page 220 Patricia P.			
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	24 debt correct?	<ol> <li>reflected in the correspondence in the file</li> <li>A. Yes.</li> <li>Q as the D023?</li> <li>A. Yes.</li> <li>Q. Okay. Do you know if the content of</li> <li>this letter has changed over time?</li> <li>A. More than likely, yes.</li> <li>Q. Okay. But Navient would have copies</li> <li>of what this letter looked like each time it</li> <li>was at the given time?</li> <li>A. Yes.</li> <li>Q. Now, the disclosures at the bottom</li> <li>which says, "Important Disclosures," "This is</li> <li>an attempt to collect a debt. Information</li> <li>obtained will be used for that purpose," do</li> <li>you know if that language has been in the</li> <li>each version of the document?</li> <li>A. For what period of time?</li> <li>Q. Dating back to, say, 2005.</li> <li>A. It was added at some point. I don't</li> <li>know if it was prior to 2005 or after 2005.</li> <li>Q. But at some point it was added. The</li> </ol>	Page 218	1 regardless of whether or not the borrower 2 previously had a bankruptcy? 3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 10 No. 14 was marked for identification.) 11 MR. FARRELL: You took 12 Exhibit 14 out of your folder labeled 13 "Exhibit 13." 14 MR. BURGE: 31 in fact. 15 MR. FARRELL: Oh. Is it 31? 16 I'm looking at it upside-down. 17 MR. BURGE: These have no 18 meaning, unfortunately. 19 BY MR. BURGE: 20 Q. So do you recognize this document? 21 A. Yes. 22 Q. What is this document?
24 debt, correct? 24 call agents.	21 Can agents.	<ol> <li>reflected in the correspondence in the file</li> <li>A. Yes.</li> <li>Q as the D023?</li> <li>A. Yes.</li> <li>Q. Okay. Do you know if the content of</li> <li>this letter has changed over time?</li> <li>A. More than likely, yes.</li> <li>Q. Okay. But Navient would have copies</li> <li>of what this letter looked like each time it</li> <li>was at the given time?</li> <li>A. Yes.</li> <li>Q. Now, the disclosures at the bottom</li> <li>which says, "Important Disclosures," "This is</li> <li>an attempt to collect a debt. Information</li> <li>obtained will be used for that purpose," do</li> <li>you know if that language has been in the</li> <li>each version of the document?</li> <li>A. For what period of time?</li> <li>Q. Dating back to, say, 2005.</li> <li>A. It was added at some point. I don't</li> <li>know if it was prior to 2005 or after 2005.</li> <li>Q. But at some point it was added. The</li> <li>purpose of this letter is to collect on a</li> </ol>	Page 218	1 regardless of whether or not the borrower 2 previously had a bankruptcy? 3 MR. FARRELL: Object to the 4 form. 5 THE WITNESS: Correct. 6 BY MR. BURGE: 7 Q. I show you a document which I will 8 mark Peterson 14. 9 (Peterson Deposition Exhibit 10 No. 14 was marked for identification.) 11 MR. FARRELL: You took 12 Exhibit 14 out of your folder labeled 13 "Exhibit 13." 14 MR. BURGE: 31 in fact. 15 MR. FARRELL: Oh. Is it 31? 16 I'm looking at it upside-down. 17 MR. BURGE: These have no 18 meaning, unfortunately. 19 BY MR. BURGE: 20 Q. So do you recognize this document? 21 A. Yes. 22 Q. What is this document? 23 A. Again, a training reference for our

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1 follow once you get notice that a bankruptcy		1 Q. This is just notifying them that they	
2 has ended either in dismissal or discharge.		2 need to start making payments?	
3 Correct?		3 A. Yes.	
4 A. Yes.		4 Q. Let me show you another document.	
5 Q. So after you go through a number of		5 This was not produced in this case, but it was	
6 steps, you then get to step 7, which is to		6 publicly filed in another case. Mark it as	
7 send the L180 letter unless the private loan		7 Peterson 17.	
8 will be discharged.		8 (Peterson Deposition Exhibit	
9 Correct?		9 No. 17 was marked for identification.)	
10 A. Yes.		10 BY MR. BURGE:	
11 Q. And so once you've determined		11 Q. I think it pretty closely tracks the	
you've gone through the steps and you have		12 language of Peterson 16. Do you recognize	
got the bankruptcy is over, you then send		13 this document?	
that L180 letter to the borrower, correct?		14 A. It looks to be the same document, just	
15 Unless you conclude that the private loan is		15 a different version.	
16 going to be discharged.		16 Q. Slightly different form. But this	
17 A. Yes.		would also be that L180 letter, right?	
18 Q. Now, I want to take a look at what		18 A. I can't tell that from here.	
19 that L180 letter looks like. So mark this as		19 MR. FARRELL: Jason, I'm going	
20 Peterson 16.		20 to tell you, not because I'm trying to do this	
21 (Peterson Deposition Exhibit		21 but just so you know, you can read through the	
22 No. 16 was marked for identification.)		22 blackout. If you hold it at the right angle,	
23 BY MR. BURGE:		23 I can read the blacked-out information.	
24 Q. I'll ask you if you recognize this		MR. BURGE: This whole thing's	
Patricia P. Peterson	Page 234	Patricia P. Peterson	Page 236
1 document.		1 subject to a protective order.	
2 A. Yeah.		2 MR. FARRELL: I'm just letting	
3 Q. Okay. It doesn't have the L180 letter		3 you know.	
4 I think maybe because the way it was produced.	,	4 MR. BURGE: Hopefully this will	
5 but do you recognize this to be the L180		5 make it easier if we ever have to submit it to	
6 letter?		6 the court or anything. Agreed. I don't think	
7 A. Yeah.		7 any of it's secret. You can look up the case	
<b>8</b> Q. Okay. And the information it provides		8 number and see who it is.	
9 is: "We have been notified that your		9 MR. FARRELL: Wanted to let you	
10 bankruptcy case has been concluded. Since the		10 know in case you were intending for that to be	
11 loan shown above was not discharged through		11 permanent blackout. It's not.	
12 your bankruptcy, you are responsible for		MR. BURGE: Understood.	
13 repaying the remaining balance of the loan		13 BY MR. BURGE:	
14 according to the terms of the promissory		14 Q. If you look on the right side in these	
15 note."		15 kind of small you see in the far right is	
16 See that?		<b>16</b> an "L180"?	
17 A. I do.		17 A. Okay.	
		<b>18</b> Q. That suggests this is the L180 letter?	
<b>18</b> Q. This is what you send to the borrower		- A OI	
		19 A. Okay.	
<b>18</b> Q. This is what you send to the borrower		20 Q. Maybe this is just a different form	
<b>18</b> Q. This is what you send to the borrower <b>19</b> once they finished their bankruptcy and you're		•	
<ul><li>Q. This is what you send to the borrower</li><li>once they finished their bankruptcy and you're</li><li>putting them back into repayment, correct?</li></ul>		20 Q. Maybe this is just a different form	
<ul> <li>18 Q. This is what you send to the borrower</li> <li>19 once they finished their bankruptcy and you're</li> <li>20 putting them back into repayment, correct?</li> <li>21 A. Yes.</li> </ul>		<ul><li>20 Q. Maybe this is just a different form</li><li>21 that was used on or about December 2nd of</li></ul>	

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- 100	, 10110 5 0111 10115, 22 0,		~ · F · · · · · ·	,
Pat	ricia P. Peterson	Page 237	Patricia P. Peterson	Page 239
1	Q. Sure. This has similar language to		1 what it says.	
2	the last one. Starts with the exact same		2 BY MR. BURGE:	
3	first sentence: "We've recently been notified		3 Q. Maybe I can get at it this way	
4	that your bankruptcy case has concluded."		4 without I don't want to know what your	
5	See that?		5 lawyers told you. Don't tell me what your	
6			6 lawyers told you. But this letter back in	
7	0 011 1 1100 0 1 1		7 December 2015 specifically said on it: "This	
8	language kind of similar to what we saw in the		8 is an attempt to collect a debt," correct?	
9	call centers. "The bankruptcy doesn't always		9 A. Yes.	
10	discharge student loans, and because your loan		10 Q. And the substance of the letter, that	
11	shown above wasn't discharged, you remain		11 paragraph that starts: "We have recently been	
12	responsible for paying the entire remaining		12 notified that your bankruptcy case is	
13	balance."		13 concluded," that's the same substance in both	
14	See that?		14 letters, right?	
15	And then function, that's		15 A. Generally, yes.	
	basically the same as the L180 letter produced		16 Q. Let me show you a document which I	
16	here, right? Same message being delivered?		17 will mark Peterson 18.	
17	MR. FARRELL: Object to the			
18	form.			
19				
20	THE WITNESS: The intended		20 BY MR. BURGE:	
21	message, yes.  BY MR. BURGE:		<ul><li>21 Q. I'll ask you if you recognize this</li><li>22 document.</li></ul>	
22				
23	8 8		23 A. I don't recall this document, but I	
24	bottom that this is an attempt to collect a		24 recognize how it's used.	
Pat	ricia P. Peterson	Page 238	Patricia P. Peterson	Page 240
1	debt and information obtained will be used for		1 Q. I really just want to call your	
2	that purpose.		2 attention to one thing about it. If you take	
3	See that?		3 a look at the second page, there's a reference	
4	A. I do.		4 to some correspondence codes. See that? And	
5	Q. And that's 'cause that language was		5 letter codes?	
6	put in there because this L180 letter was an		6 A. Yes.	
7	attempt to collect on a debt?		<b>7</b> Q. And these are the codes that would be	
8	MR. FARRELL: Object to the		8 entered into the correspondence when these	
9	form.		9 events happened and these letters are sent,	
10	<b>THE WITNESS:</b> No. That's a		10 correct?	
11	legal we get guidance from legal whether we		11 A. Will you restate that?	
12	should include this type of language in our		<b>12</b> Q. These are the correspondence codes and	
13	letters or not.		13 the letter codes to be entered into the	
14			14 correspondence file when these events happen	
15	0 0 11 1 0 1 00045		15 or when these letters are sent.	
16	Navient got guidance from legal that it should		16 A. Yes.	
17	include this is an attempt I don't know		17 Q. And L180, the letter we just looked	
18	what you were specifically told by legal.		18 at, is described as the bankruptcy letter to	
19	MR. FARRELL: Don't answer the		19 borrower filed on or after October 8, '98?	
20	question. You can confirm that this is a		20 A. Yes.	
21	letter that has that language on it. If the		21 Q. Now I want to look at some	
22	decision to put the language on there is		22 correspondence histories. So I show you	
	legally driven, if that's your understanding,			
23			<ul><li>23 I'm going to give you two documents at once,</li><li>24 but then we're going to go through each of</li></ul>	
24				

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September 19	, 2017
Page 249 Patricia P. Peterson Page	je 251
1 Parent loan, but it's for a grad student. So	
2 Grad Plus program.	
3 Q. So you've got the these are all	
4 are these all federal loans?	
5 A. With the exception of the bottom one,	
6 which is the Bar Study.	
7 Q. You understand that's the loan that's	
8 at issue in our case.	
9 A. Yes.	
10 Q. And now I'll note for the CLASS	
11 correspondence history here, if you look at	
12 like the second page, it's 256 at the bottom,	
13 there's a reference at the top, it says,	
14 "loans all."	
15 You see that?	
16 A. Yes.	
<b>17</b> Q. So that is getting the correspondence	
18 for all 11 of his loans, correct?	
19 A. Yes.	
20 Q. But you could theoretically set that	
21 to be just loan No. 11 and you'd only get the	
<b>22</b> correspondence history for loan No. 11.	
23 Correct?	
24 A. You could, but you'll still pick up	
Page 250 Patricia P. Peterson Pag	ge 252
1 many of these explain what CLASS does. If	
2 correspondence is entered under the "all," it	
3 will appear on every single loan. If it's	
4 entered under a loan number, so if you	
5 remember the X that you put on there, if you	
6 go into the screen and enter it as X for just	
7 the one loan, then you will see it when you	
8 look at the "all," but you will also see it	
n the 9 when you look at that loan, but you won't see	
10 it when you look at a different loan.	
11 Q. So there's some correspondence that	
12 applies to all loans and some correspondence	
13 that are loan-specific?	
14 A. Yes, but it's dependent on how the	
15 agent accesses this screen when they put their	
16 notes in.	
17 Q. And so when you look at using this	
18 information, which is marked for all, is there	
any way to tell for any given correspondence	
	Page 249 Patricia P. Peterson Page 349 Patricia P. Peterson 1 Parent loan, but it's for a grad student. So 2 Grad Plus program. 3 Q. So you've got the these are all 4 are these all federal loans? 5 A. With the exception of the bottom one, 6 which is the Bar Study. 7 Q. You understand that's the loan that's 8 at issue in our case. 9 A. Yes. 10 Q. And now I'll note for the CLASS 11 correspondence history here, if you look at 12 like the second page, it's 256 at the bottom, 13 there's a reference at the top, it says, 14 "loans all." 15 You see that? 16 A. Yes. 17 Q. So that is getting the correspondence 18 for all 11 of his loans, correct? 19 A. Yes. 20 Q. But you could theoretically set that 21 to be just loan No. 11 and you'd only get the 22 correspondence history for loan No. 11. 23 Correct? 24 A. You could, but you'll still pick up  Page 250 Patricia P. Peterson Page 1 many of these explain what CLASS does. If 2 correspondence is entered under the "all," it 3 will appear on every single loan. If it's 4 entered under a loan number, so if you 5 remember the X that you put on there, if you 6 go into the screen and enter it as X for just 7 the one loan, then you will see it when you 8 look at the "all," but you will also see it 9 when you look at a different loan. 11 Q. So there's some correspondence that applies to all loans and some correspondence 13 that are loan-specific? 14 A. Yes, but it's dependent on how the 15 agent accesses this screen when they put their notes in. 17 Q. And so when you look at using this information, which is marked for all, is there

21 Q. Who's the PL again?

22 A. It's a plus sign, but it looks like

24 federal -- federal program, we call it a

23 the graduate program. The student must have a

21 of the other ten loans?

22 A. Not by looking at this.

23 Q. Let's take a look -- if you scroll

24 ahead to -- scroll ahead to at the bottom it's

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1 October 18th, '05, and after, then you proceed		1 understanding, go ahead.
2 to step 3, correct?		2 THE WITNESS: Yes.
3 A. Yes.		3 BY MR. BURGE:
4 Q. So now you go into the field and the		4 Q. And at that point Navient begins again
5 first question is to look at the 1098-E field,		5 collecting on the loans?
6 correct?		6 A. Yes.
7 A. Yes.		7 Q. Now, it's your understanding, and we
<b>8</b> Q. And that 1098-E field is whether the		8 looked at that earlier, you should only be
9 loan is eligible to receive a 1098?		9 eligible for a 1098 if you went to a Title IV
10 A. Yes.		10 institution because you have to have a
<b>11</b> Q. That's what that field means, correct?		11 qualified education loan.
12 And so it looks like there's at least four		12 Correct?
13 possibilities: Y, Q, blank, and N.		13 A. Correct. Sorry.
14 See that?		14 Q. So if somebody is 1098-eligible, if
15 A. Yes.		15 they have that Y, that's a sign that they went
<b>16</b> Q. So I'm assuming Y is yes, it is		16 to a Title IV institution.
17 eligible for 1098. Correct?		17 A. Yes.
18 A. Yes.		<b>18</b> Q. Now, the other side of 3 is if the
<b>19</b> Q. And N is no, it's not eligible for a		19 1098-E field is marked "no," then you continue
20 1098. Correct?		20 to the next step.
21 A. Yes.		21 Right?
22 Q. What is Q and blank?		22 A. Correct.
23 A. Q is we need some additional		23 Q. It's called 3(b). Then you ask
24 information from the borrower to determine		24 whether the flag has ever been changed. If
Patricia P. Peterson	Page 322	Patricia P. Peterson Page 324
1 whether it should be a "yes" or a "no."		1 the flag was changed from Y or Q, then the
2 Q. Okay. And what is blank?		<ul><li>1 the flag was changed from Y or Q, then the</li><li>2 loan is not dischargeable.</li></ul>
3 A. I don't know if we don't have a		3 Why is that?
4 disposition on it.		4 MR. FARRELL: Object to the
5 Q. Okay. So the way these procedures are		5 form.
6 applied, you take a look at the 1098-E field		6 THE WITNESS: I don't know why
7 and if it is Y, Q, or blank, then the loan is		7 this step was added in here.
8 placed back into repayment.		8 BY MR. BURGE:
9 See that?		9 Q. Who creates these policies?
10 A. Yes.		10 A. This procedure is put together by the
11 Q. So that's the determination, based on		= t iii iiis procedure is put together s, the
12 Navient's procedures, that the loan is		11 training department on the servicing side that
13 non-dischargeable, correct?		11 training department on the servicing side that 12 supports the claims area.
		12 supports the claims area.
14 MR. FARRELL: I know I have said		<ul><li>12 supports the claims area.</li><li>13 Q. Who put together this particular</li></ul>
14 MR. FARRELL: I know I have said		<ul><li>12 supports the claims area.</li><li>13 Q. Who put together this particular</li></ul>
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### Confidential

Nav	vient Solutions, LLC,		Septemb	er 19, 2017
Pat	ricia P. Peterson	Page 325	Patricia P. Peterson	Page 327
1	education loans.		1 A. Correct.	
2	Correct?		2 Q. Okay. Then so if it's a	
3	A. I don't know the answer on blank. I		3 non-Title IV school, you're going to have a	
4	can answer the rest of your questions. I		4 1098-E, and then you're going to skip ahead,	
5	don't know the answer on blank.		5 and then the question is what's the school	
6	Q. If we wanted to get that answer, we		6 type code. And you look at that second place,	
7	would have to talk to Josh Courter?		7 and here, if it's an A or B, you go if it's	
8	MR. FARRELL: Object to form.		8 a C or D, then it's discharged. If it's an A	
9	BY MR. BURGE:		9 or B what happens if A or B? "Corr MY66	
10	Q. Or you would have to talk to		10 and GY35," what does that mean?	
11	Josh Courter. Somebody would have to talk to		11 A. If the school type is A or B, it means	
12	Josh Courter?		12 it's a Title IV and it not eligible for	
13	A. Yes.		13 write-off.	
14	Q. So why would the 1098-E flag be		14 Q. So what that means basically is it's	
15	changed?		15 non-dischargeable and it goes back into	
16	A. In the case of the Q, if it's a Q, we		16 repayment?	
17	ask the customer to provide information that		17 A. Correct.	
18	tells us whether or not the loan, the proceeds		<b>18</b> Q. So then once you determine it's	
19	were to be used for their student loan or to		19 dischargeable, in that C or D situation it	
20	pay for school education.		20 says if you have determined it's	
21	Q. Okay. And so if the flag was		21 dischargeable, specifically do not send the	
22	originally Q and then the person says, I used		22 L180 letter.	
23	it to pay for education but not at a Title IV		Do you see that?	
24	school, wouldn't you then change the flag from		MR. FARRELL: Object to the	
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Pat	ricia P. Peterson Q to N?	Page 326	Patricia P. Peterson  1 form.	Page 328
1		Page 326	_	Page 328
1	Q to N?	Page 326	1 form.	Page 328
1 2 3	Q to N?  A. The customer can't tell us change	Page 326	<ol> <li>form.</li> <li>BY MR. BURGE:</li> </ol>	Page 328
1 2 3	Q to N?  A. The customer can't tell us change the where this money was disbursed.	Page 326	<ol> <li>form.</li> <li>BY MR. BURGE:</li> <li>Q. It's right in the middle of the fourth</li> <li>bullet point.</li> <li>A. I'm just reading.</li> </ol>	Page 328
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q to N?  A. The customer can't tell us change the where this money was disbursed.  Q. So Q is you know it's a Title IV-eligible school, but you're not sure if they used the money correctly to be an eligible loan.  A. We know it's a Title IV school. And we need the customer to tell us the cost-of-attendance piece of it on whether or not this was used for their schooling.  Q. So that's when you'd have a Q, and if they tell you that it has been used for their schooling, then you change it to Y. If they tell you it hasn't, then you go to N?  A. That's right.  Q. Is Q for direct-to-consumer loans, or would that apply also where you pay the school directly?	Page 326	<ol> <li>form.</li> <li>BY MR. BURGE:</li> <li>Q. It's right in the middle of the fourth</li> <li>bullet point.</li> <li>A. I'm just reading.</li> <li>Yes. Right.</li> <li>Q. So in that situation, you don't send</li> <li>the L180 letter and you sent an email saying</li> <li>write-off.</li> <li>A. Yes.</li> <li>Q. Otherwise, you go back into repayment</li> <li>and you proceed to step 4.</li> <li>A. Yes.</li> <li>Q. And that's where and step 4 says,</li> <li>"If the loan is in bankruptcy status and the</li> <li>loan is not dischargeable, you place the loan</li> <li>back into repayment to continue servicing,"</li> <li>and you refer to those bankruptcy</li> <li>discharge/dismissal procedures?</li> </ol>	Page 328
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q to N?  A. The customer can't tell us change the where this money was disbursed.  Q. So Q is you know it's a Title IV-eligible school, but you're not sure if they used the money correctly to be an eligible loan.  A. We know it's a Title IV school. And we need the customer to tell us the cost-of-attendance piece of it on whether or not this was used for their schooling.  Q. So that's when you'd have a Q, and if they tell you that it has been used for their schooling, then you change it to Y. If they tell you it hasn't, then you go to N?  A. That's right.  Q. Is Q for direct-to-consumer loans, or would that apply also where you pay the school directly?  A. That I'm not sure.	Page 326	1 form. 2 BY MR. BURGE: 3 Q. It's right in the middle of the fourth 4 bullet point. 5 A. I'm just reading. 6 Yes. Right. 7 Q. So in that situation, you don't send 8 the L180 letter and you sent an email saying 9 write-off. 10 A. Yes. 11 Q. Otherwise, you go back into repayment 12 and you proceed to step 4. 13 A. Yes. 14 Q. And that's where and step 4 says, 15 "If the loan is in bankruptcy status and the 16 loan is not dischargeable, you place the loan 17 back into repayment to continue servicing," 18 and you refer to those bankruptcy 19 discharge/dismissal procedures? 20 A. Yes.	Page 328
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q to N?  A. The customer can't tell us change the where this money was disbursed.  Q. So Q is you know it's a Title IV-eligible school, but you're not sure if they used the money correctly to be an eligible loan.  A. We know it's a Title IV school. And we need the customer to tell us the cost-of-attendance piece of it on whether or not this was used for their schooling.  Q. So that's when you'd have a Q, and if they tell you that it has been used for their schooling, then you change it to Y. If they tell you it hasn't, then you go to N?  A. That's right.  Q. Is Q for direct-to-consumer loans, or would that apply also where you pay the school directly?  A. That I'm not sure.  Q. But I guess the point is if it's not a	Page 326	1 form. 2 BY MR. BURGE: 3 Q. It's right in the middle of the fourth 4 bullet point. 5 A. I'm just reading. 6 Yes. Right. 7 Q. So in that situation, you don't send 8 the L180 letter and you sent an email saying 9 write-off. 10 A. Yes. 11 Q. Otherwise, you go back into repayment 12 and you proceed to step 4. 13 A. Yes. 14 Q. And that's where and step 4 says, 15 "If the loan is in bankruptcy status and the 16 loan is not dischargeable, you place the loan 17 back into repayment to continue servicing," 18 and you refer to those bankruptcy 19 discharge/dismissal procedures? 20 A. Yes. 21 Q. So we have got roughly 43,000 names of	Page 328
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q to N?  A. The customer can't tell us change the where this money was disbursed.  Q. So Q is you know it's a Title IV-eligible school, but you're not sure if they used the money correctly to be an eligible loan.  A. We know it's a Title IV school. And we need the customer to tell us the cost-of-attendance piece of it on whether or not this was used for their schooling.  Q. So that's when you'd have a Q, and if they tell you that it has been used for their schooling, then you change it to Y. If they tell you it hasn't, then you go to N?  A. That's right.  Q. Is Q for direct-to-consumer loans, or would that apply also where you pay the school directly?  A. That I'm not sure.  Q. But I guess the point is if it's not a non-Title IV school, it should never have a Y	Page 326	1 form. 2 BY MR. BURGE: 3 Q. It's right in the middle of the fourth 4 bullet point. 5 A. I'm just reading. 6 Yes. Right. 7 Q. So in that situation, you don't send 8 the L180 letter and you sent an email saying 9 write-off. 10 A. Yes. 11 Q. Otherwise, you go back into repayment 12 and you proceed to step 4. 13 A. Yes. 14 Q. And that's where and step 4 says, 15 "If the loan is in bankruptcy status and the 16 loan is not dischargeable, you place the loan 17 back into repayment to continue servicing," 18 and you refer to those bankruptcy 19 discharge/dismissal procedures? 20 A. Yes. 21 Q. So we have got roughly 43,000 names of 22 people on that list who have school types C or	Page 328
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q to N?  A. The customer can't tell us change the where this money was disbursed.  Q. So Q is you know it's a Title IV-eligible school, but you're not sure if they used the money correctly to be an eligible loan.  A. We know it's a Title IV school. And we need the customer to tell us the cost-of-attendance piece of it on whether or not this was used for their schooling.  Q. So that's when you'd have a Q, and if they tell you that it has been used for their schooling, then you change it to Y. If they tell you it hasn't, then you go to N?  A. That's right.  Q. Is Q for direct-to-consumer loans, or would that apply also where you pay the school directly?  A. That I'm not sure.  Q. But I guess the point is if it's not a	Page 326	1 form. 2 BY MR. BURGE: 3 Q. It's right in the middle of the fourth 4 bullet point. 5 A. I'm just reading. 6 Yes. Right. 7 Q. So in that situation, you don't send 8 the L180 letter and you sent an email saying 9 write-off. 10 A. Yes. 11 Q. Otherwise, you go back into repayment 12 and you proceed to step 4. 13 A. Yes. 14 Q. And that's where and step 4 says, 15 "If the loan is in bankruptcy status and the 16 loan is not dischargeable, you place the loan 17 back into repayment to continue servicing," 18 and you refer to those bankruptcy 19 discharge/dismissal procedures? 20 A. Yes. 21 Q. So we have got roughly 43,000 names of	Page 328

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1 wanted to ask this one because it has		1 type analysis.	
2 something the others don't. If you take a		2 Do you see that?	
3 look at top of page 2, it's 62895 on the		3 A. Yes.	
4 bottom, it actually has a little definition of		<b>4</b> Q. So it looks like under these	
5 the school-type field where it says the first		5 procedures, a Q could be dischargeable,	
6 character will indicate the type of school and		6 whereas under the more recent procedures, a Q	
7 the second character will indicate eligibility		7 is not dischargeable.	
8 for discharge, Title IV eligibility.		8 See that?	
9 See that?		9 A. I see it, yes.	
10 A. Yes.		<b>10</b> Q. But these are the older procedures	
11 Q. And that's your understanding of what		11 that would have belonged to Sallie Mae	
12 the A, B, C, D is. It's that Title IV		12 Financial. What you have now are the	
13 eligibility, eligibility for discharge, right?		13 procedures that are under the what you have	
14 A. Yes.		14 now is the more modern Navient procedures we	
<b>15</b> Q. And according to that, C or D are the		15 looked at a second ago, correct?	
<b>16</b> two columns that are eligible for discharge.		16 A. Correct.	
17 A and B that are not eligible for discharge,		<b>17</b> Q. And I show you a document marked 34.	
18 right?		18 (Peterson Deposition Exhibit	
19 A. Yes.		19 No. 34 was marked for identification.)	
20 Q. I'm going to skip this one. What is		20 BY MR. BURGE:	
21 SLMF?		21 Q. This is a policy entitled, "Bankruptcy	
22 A. Sallie Mae Financial.		22 Write-Offs." This is the policy used for the	
23 Q. Okay. So if I have an SLMF document,		23 actual write-off of the dischargeable loan.	
24 that's an older document, probably replaced by		24 See that?	
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1 a Navient document?		1 A. The procedure?	
2 A. Probably. Or RKL Financial.		<b>2</b> Q. Yes, the procedure. Sorry.	
<b>3</b> Q. I'm actually going to show you this		3 You will notice the first step	
4 just because it's an earlier version what		4 there is: "Verify the loan is eligible for	
5 are we on, Peterson?		5 write-off by confirming it's a private loan	
6 THE VIDEOGRAPHER: 33.		6 and reviewing the 1098-E eligibility school	
7 (Peterson Deposition Exhibit		7 code and cosigner information."	
8 No. 33 was marked for identification.)		8 See that?	
9 BY MR. BURGE:		9 A. Yes.	
<b>10</b> Q. Earlier version I think of something		<b>10</b> Q. And that kind of in a nutshell	
11 we just looked at from Sallie Mae Financial.		11 describes what we have been looking at for	
12 That Career Training and self-insured loans		12 probably 45 minutes which is the way that	
13 document. This will one from all the way back		13 Navient instructs its agents to determine	
14 in January of 2009. This has the same		14 whether a loan is dischargeable or	
15 there's some procedures that are slightly		15 non-dischargeable is based on the 1098-E	
16 different.		16 eligibility, the school code, and the cosigner	
So take a look at part 2,		17 information.	
<b>18</b> 10/18/05 and after. See that?		18 Correct?	
19 A. Yes.		19 A. Yes.	
20 Q. The Career Training and self-insured		20 Q. And then assuming you determine it's	
<ul><li>20 Q. The Career Training and self-insured</li><li>21 loans. Here again, you start with the 1098-E</li></ul>		<ul><li>20 Q. And then assuming you determine it's</li><li>21 dischargeable or eligible for write-off, you</li></ul>	
<ul> <li>20 Q. The Career Training and self-insured</li> <li>21 loans. Here again, you start with the 1098-E</li> <li>22 field, but if it's a Y, you place it back into</li> </ul>		<ul> <li>20 Q. And then assuming you determine it's</li> <li>21 dischargeable or eligible for write-off, you</li> <li>22 follow these procedures to write it off?</li> </ul>	
<ul> <li>20 Q. The Career Training and self-insured</li> <li>21 loans. Here again, you start with the 1098-E</li> <li>22 field, but if it's a Y, you place it back into</li> <li>23 repayment. But here, if it's an N, a Q, or a</li> </ul>		<ul> <li>20 Q. And then assuming you determine it's</li> <li>21 dischargeable or eligible for write-off, you</li> <li>22 follow these procedures to write it off?</li> <li>23 A. Correct.</li> </ul>	
<ul> <li>20 Q. The Career Training and self-insured</li> <li>21 loans. Here again, you start with the 1098-E</li> <li>22 field, but if it's a Y, you place it back into</li> </ul>		<ul> <li>20 Q. And then assuming you determine it's</li> <li>21 dischargeable or eligible for write-off, you</li> <li>22 follow these procedures to write it off?</li> </ul>	